

SCANNED

DATE: 06/21/04

BY: SKV

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FILED

2004 JUN 18 A 11:50

U.S. DISTRICT COURT  
DISTRICT OF MASS

JACQUELINE LASSITER,

Plaintiff,

v.

KIMBER ANDERSON, BRIAN GIBBS,  
FLEET BANK

Defendants.

Civil Action No. 04-cv-10550-WGY

June 22, 2004  
YOUNG, D.J.

So ordered as the case management  
scheduling order. *Defendants' proposal is adopted.*

Discovery due June 15, 2005

Dispositive Motions due Nov 30, 2004

William H. Young  
U.S. District Judge

**DEFENDANTS' STATEMENT PURSUANT TO LOCAL RULE 16.1(D)**

Having attempted to confer in accordance with Rule 26(f) of the Federal Rules of Civil Procedure and Local Rule 16.1(D), Defendants Kimber Anderson ("Anderson"), Brian Gibbs ("Gibbs"), and Fleet National Bank (incorrectly identified in Plaintiff's Complaint as "Fleet Bank") (Anderson, Gibbs, and Fleet are hereinafter sometimes collectively referred to as "Defendants,") propose the following schedule for discovery in this action:

**1. Discovery Plan**

(a) Supplementation of disclosures required by Fed.R.Civ.P. 26(a)(1) may be made at any time but no later than September 1, 2004.

(b) All written discovery served no later than October 1, 2004.

(c) All lay witness depositions and responses to written discovery served in accordance with the time limitations set forth in the applicable Federal Rule of Civil Procedure and no later than October 30, 2004.

(d) Plaintiff to disclose information on expert witnesses pursuant to Fed.R.Civ.P. 26(a)(2) no later than November 15, 2004.

(e) Defendants to disclose information on expert witnesses pursuant to Fed.R.Civ.P. 26(a)(2) no later than December 15, 2004.

(f) All depositions, including deposition of expert witnesses, to be completed no later than January 15, 2005.

**2. Proposed Motions Schedule**

(a) Motions for amendments to the pleadings may be filed at any time but no later than September 15, 2004.

(b) Motions to add additional parties to the lawsuit may be filed at any time but no later than October 1, 2004.

(c) Motions for Summary Judgment may be filed at any time but no later than November 30, 2004.

**3. Certifications**

The parties' certifications will be filed under separate cover.

Respectfully submitted,

**FLEET NATIONAL BANK**

By its attorneys,



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